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Attorneys for Plaintiff
11 UNITED STATES OF AMERICA

12 UNITED STATES DISTRICT COURT
13 FOR THE CENTRAL DISTRICT OF CALIFORNIA

14 UNITED STATES OF AMERICA,
15 Plaintiff,
16 v.
17 JOHNATHAN BUMA,
18 Defendant.
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No. CR 25-58-JVS

STIPULATION REGARDING REQUEST FOR
(1) CONTINUANCE OF TRIAL DATE AND
(2) FINDINGS OF EXCLUDABLE TIME
PERIODS PURSUANT TO SPEEDY TRIAL
ACT

CURRENT TRIAL DATE: 12/9/2025
PROPOSED TRIAL DATE: 4/7/2026

21 Plaintiff United States of America, by and through its counsel
22 of record, the United States Attorney for the Central District of
23 California and Assistant United States Attorney David T. Ryan and
24 Trial Attorney Menno Goedman, and defendant Johnathan Buma
25 ("defendant"), both individually and by and through his counsel of
26 record, Mark Geragos, Alexandra Kazarian, and Setara Qassim, hereby
27 stipulate as follows:
28

1 1. The Information in this case was filed on April 17, 2025.
2 Defendant first appeared before a judicial officer of the court in
3 which the charges in this case were pending on May 1, 2025. The
4 Speedy Trial Act, 18 U.S.C. § 3161, originally required that the
5 trial commence on or before July 10, 2025.

6 2. On May 1, 2025, the Court set a trial date of June 24,
7 2025, and a status conference date of June 16, 2025.

8 3. Defendant is released on bond pending trial. The parties
9 estimate that the trial in this matter will last approximately four
10 to five days.

11 4. The Court has previously continued the trial date in this
12 case from June 24, 2025, to December 9, 2025, and found the interim
13 period to be excluded in computing the time within which the trial
14 must commence, pursuant to the Speedy Trial Act.

15 5. By this stipulation, defendant moves to continue the trial
16 date to April 7, 2026, and the status conference to March 30, 2026.
17 This is the second request for a continuance.

18 6. Defendant requests the continuance based upon the following
19 facts, which the parties believe demonstrate good cause to support
20 the appropriate findings under the Speedy Trial Act:

21 a. Defendant is charged with a violation of Title 18,
22 United States Code, Section 1905: Disclosure of Confidential
23 Information. The government has made certain discovery available to
24 the defense, including search warrants and reports of investigation.
25 The government anticipates producing additional discovery to
26 defendant pursuant to a protective order and other necessary
27 protections to account for the sensitivity of certain discovery in
28 the case.

1 b. On May 1, 2025, defendant's current counsel
2 substituted in as counsel of record. Defense counsel is presently
3 scheduled to be in a criminal trial on August 21, 2025, in People v.
4 McGee, No. RIF140673, in the Superior Court of California, County of
5 Riverside, which is estimated to last six weeks; a civil trial on
6 September 2, 2025, in Tipping et al. v. City of Los Angeles et al.,
7 No. 22STCV38178, in the Superior Court of California, County of Los
8 Angeles, which is estimated to last two weeks; a civil trial on
9 September 22, 2025, in County of Los Angeles et al. v. CROAG, Inc.,
10 No. 21STCV03275, in the Superior Court of California, County of Los
11 Angeles, which is estimated to last two weeks; a criminal trial on
12 September 23, 2025, in United States v. Sangha et al., CR No. 24-236-
13 SPG, in the Central District of California, which is estimated to
14 last three weeks; a civil trial on October 20, 2025, in Danelyan, et
15 al. vs. Kenneth Kita, MD, et al., Case No. 23GDCV01926, in the
16 Superior Court of California, County of Los Angeles, which is
17 estimated to last ten days; a criminal trial on October 28, 2025, in
18 United States v. Salgado, CR No. 24-201-JGB, in the Central District
19 of California, which is estimated to last one week; a criminal trial
20 on November 17, 2025, in United States v. Magzanyan, CR No. 20-254-
21 JAD-EJY, in the Central District of Nevada, which is estimated to
22 last one week; and a civil trial on March 16, 2026, in Contreras v.
23 Providence St. Jude Medical Center et al., No.30-2024-01397408, in
24 the Superior Court of California, County of Orange, which is
25 estimated to last one to two weeks. Accordingly, counsel represents
26 that they will not have the time that they believe is necessary to
27 prepare to try this case on the current trial date.

1 c. In light of the foregoing, counsel for defendant also
2 represent that additional time is necessary to confer with defendant,
3 conduct and complete an independent investigation of the case,
4 conduct and complete additional legal research including for
5 potential pre-trial motions, review the discovery and potential
6 evidence in the case, and prepare for trial in the event that a
7 pretrial resolution does not occur. Defense counsel represent that
8 failure to grant the continuance would deny them reasonable time
9 necessary for effective preparation, taking into account the exercise
10 of due diligence.

11 d. Defendant believes that failure to grant the
12 continuance will deny him continuity of counsel and adequate
13 representation.

14 e. The government does not object to the continuance.

15 f. The requested continuance is not based on congestion
16 of the Court's calendar, lack of diligent preparation on the part of
17 the attorney for the government or the defense, or failure on the
18 part of the attorney for the Government to obtain available
19 witnesses.

20 7. For purposes of computing the date under the Speedy Trial
21 Act by which defendant's trial must commence, the parties agree that
22 the time period of December 9, 2025 to April 7, 2026, inclusive,
23 should be excluded pursuant to 18 U.S.C. §§ 3161(h)(7)(A),
24 (h)(7)(B)(i), and (h)(7)(B)(iv) because the delay results from a
25 continuance granted by the Court at defendant's request, without
26 government objection, on the basis of the Court's finding that:
27 (i) the ends of justice served by the continuance outweigh the best
28 interest of the public and defendant in a speedy trial; (ii) failure

1 to grant the continuance would be likely to make a continuation of
2 the proceeding impossible, or result in a miscarriage of justice; and
3 (iii) failure to grant the continuance would unreasonably deny
4 defendant continuity of counsel and would deny defense counsel the
5 reasonable time necessary for effective preparation, taking into
6 account the exercise of due diligence.

7 8. Nothing in this stipulation shall preclude a finding that
8 other provisions of the Speedy Trial Act dictate that additional time
9 periods be excluded from the period within which trial must commence.
10 Moreover, the same provisions and/or other provisions of the Speedy
11 Trial Act may in the future authorize the exclusion of additional
12 time periods from the period within which trial must commence.

13 IT IS SO STIPULATED.

14 Dated: August 15, 2025

Respectfully submitted,

15 BILAL A. ESSAYLI
16 United States Attorney

17 /s/
18 DAVID T. RYAN
19 Assistant United States Attorney
Chief, National Security Division

20 MENNO GOEDMAN
21 Trial Attorney
National Security Division

22 Attorneys for Plaintiff
UNITED STATES OF AMERICA
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1 I am Johnathan Buma's attorney. I have carefully discussed
2 every part of this stipulation and the continuance of the trial date
3 with my client. I have fully informed my client of his Speedy Trial
4 rights. To my knowledge, my client understands those rights and
5 agrees to waive them. I believe that my client's decision to give up
6 the right to be brought to trial earlier than April 7, 2026, is an
7 informed and voluntary one.

8 /s/ Mark Geragos

08/15/2025

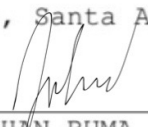
9 Mark Geragos
10 Alexandra Kazarian
Setara Qassim

Date

11 Counsel for Defendant
12 Johnathan Buma

13 I have read this stipulation and have carefully discussed it
14 with my attorney. I understand my Speedy Trial rights. I voluntarily
15 agree to the continuance of the trial date, and give up my right to
16 be brought to trial earlier than April 7, 2026. I understand that I
17 will be ordered to appear in Courtroom 10C of the Ronald Reagan
18 Federal Building and United States Courthouse, 411 West Fourth
19 Street, Santa Ana, California on April 7, 2026, at 8:30 A.M.

08/15/2025

21 
22 JOHNATHAN BUMA
Defendant

Date